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MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

NOV 28 2007

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISIONJAMES M. WORTHEN(Enter above the full name
of the plaintiff or plaintiffs in
this action)

07CV6687

(JUDGE LEINENWEBER
(MAG. JUDGE COLE

vs.

Supt. Gary HickersonSgt. StonerSheriff Mr. HerreraSheriff Mr. ButlerParamedic Ms. DouglasCt. JulianSheriff Mr. Salmon(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

CHECK ONE ONLY:

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)☐ COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)☐ OTHER (cite statute, if known)**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.****I. Plaintiff(s):**

- A. Name: James M Worthem
- B. List all aliases: David Scott
- C. Prisoner identification number: 2007-0071905
- D. Place of present confinement: Cook County Jail
- E. Address: P.O. Box 089002, Chicago IL, 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: MR. Gary Hickerson
 Title: Superintendent
 Place of Employment: Cook County Jail
- B. Defendant: MR. Stoner
 Title: Sargeant
 Place of Employment: Cook County Jail
- C. Defendant: MR. Herrera
 Title: Sheriff officer
 Place of Employment: Cook County Jail

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

II. Defendants

D. Defendant: MR. Butler

Title: Sheriff officer

Place of employment: Cook County Jail

E. Defendant: LT. MR. Julian

Title: Lieutenant

Place of employment: Cook County Jail

F. Defendant: Ms. Douglas

Title: Paramedic

Place of employment: Cook County Jail

G. Defendant: MR. Salmon

Title: Sheriff Officer

Place of employment: Cook County Jail

III. Exhaustion of Administrative Remedies

You are required to exhaust all your available administrative remedies before bringing an action in federal court.

A. Is there a grievance procedure available at your institution?

YES (☒) NO () If there is no grievance procedure, skip to F.

B. Have you filed a grievance concerning the facts in this complaint?

YES () NO (☒)

C. If your answer is YES:

1. What steps did you take?

2. What was the result?

3. If the grievance was not resolved to your satisfaction, did you appeal? What was the result (if there was no procedure for appeal, so state.)

D. If your answer is NO, explain why not:

Because I've filed so many others before this one and all to no avail, I am being Retaliated against and my State and Federal constitutions are being so Drastically Violated so please believe this.

- E. Is the grievance procedure now completed? YES () NO (X)
- F. If there is no grievance procedure in the institution, did you complain to authorities? YES () NO ()

G. If your answer is YES:

1. What steps did you take?

2. What was the result?

H. If your answer is NO, explain why not:

BECAUSE I am being prejudiced against and
if I've been denied Medical treatment by C.C.S
Staff and officials and a Deliberate indifference
what would a grievance accomplish with these
officials, this Health issue is a problem and are
so slow to answer my pleas so it is my prayer
that the courts will answer my pleas.

IV. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court (including the Central and Southern Districts of Illinois):

- A. Name of case and docket number: _____

- B. Approximate date of filing lawsuit: _____
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: _____

- D. List all defendants: _____

- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): _____
- F. Name of judge to whom case was assigned: _____

- G. Basic claim made: _____

- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): _____

- I. Approximate date of disposition: _____

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

on 11/8/07 I began getting Red spots on my arm; I thought nothing of it until 2 day later when I began getting more spots on different parts of my body, I began to complain to C/O Herrera and MR C/O Butler of whom put it in Log book and told me to put in a Request form, I told them I never had an out break like this and that I was scared it may be "Merca" but officials kept ignoring me as they always do, at which is in direct Retaliation towards me for my writing Grievance on matters that I see wrong. So on 11/16/07 after all my complaints and pleas, I was taken to Rec Medical at which I was seen by a paramedic Ms. Douglas who could not figure out what it was and only had me sign a Request as I had already been doing, I was escorted back by C/O Herrera and back to wing where a Sgt Stoner was, C/O Herrera spoke in private, so on 11/19/07 I seen /flagged down Supt Hickerson and told him /showed him the huge spots of Red all over body and he assured me I'd get medical attention in the A.M of 11/20/07 and I told him of my not having any Light in cell for over 10 days and of being denied a hair cut for court while the whole wing received hair cuts on 11/16/07 and purposely didn't take me and that was C/O Herrera, I also complained of the unsanitary /unlivable conditions here at C.I.C.I. to Supt and Lt Julian many times but is overlooked, such as my feet getting bad fungus on toe nails, Athletes foot, the water Drain in Shower has been clogged for 3 weeks and my Cell has no hot water at all, the food is still being handled very unsanitary without any gloves or hairnets today 11/20/07 I complained to S/O Salmon of more breakouts on body /neck and he became Rude and said that if it was a Life/Death matter he'd call, so I got could went to healthcare.

VI. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments.
Cite no cases or statutes.

TO accept my Suit and allow me to prove factual events
and to help me stop these staff and officials from
violating their own Rules and regulations and to teach them
a lesson on Violating State and Federal Constitutional
Laws that they too must abide by and to award me
with Punitive and Monetary damages due to C.C.J. Gross
Negligence and Reckless Disregard and Deliberate Indifference
in Denying me Medical Attention. CERTIFICATION an award of \$3 Million

By signing this Complaint, I certify that the facts stated in this
Complaint are true to the best of my knowledge, information and
belief. I understand that if this certification is not correct, I may be
subject to sanctions by the Court.

Signed this 20th day of November, 2007

James Worthem

(Signature of plaintiff or plaintiffs)

James M Worthem AKA David Scott
(Print name)

2007-0071905
(I.D. Number)

James Worthem AKA David Scott #2007-0071905

P.O. Box 089002

Chicago IL 60608
(Address)

(1)

I "James M. Northen" 2007-007-1905 was taken to the Rec-Paramedic "Ms. Douglas" on 11/16/07 At Approx 9:30 pm. due to an on going serious complaint of an spotted red outbreak all over my body and it's spreads bigger and more irretating with each passing day and only I have constantly showed Sheriff officers these nasty Rashes and have been denied A Medical Doctors inspection or testing as to what this issue consists of, it could be and is Due to the filthiness of this wing, shower and unsanitary conditions on I-D- Divisions at which I've already written up the unlivable conditions and very unsanitary conditions that are leaving each and every Detainee on I-D- to the possible exposures of A serious Medical condition that could possibly be deadly if gone untreated or unanswered by C.C.Doc officials As it already has been ignored and Denied the proper attention under both State and federal Constitutional laws at which are continuously being violated extremely, on 11/16/07 I was Authorized to be escorted by % Herrera by Sgt Stoner and was seen by Paramedic "Douglas" of whom filled out a report on seeing visually A lot of unexplained Red circle spots all over chest and forearm, afterwards I was sent back to I-D- without any further Medical Attention at all. Now on 11/19/07 At Approx 8:30 am I spoke to wing officer % Mr. Butler and showed him my problem and of the spreading of these spots all over and he said he'd look into it, nothing happend, now later on at 2nd shift, I and the whole top Deck was let out at Approx 3:15 pm. on 11/19/07 and at Approx 4:45 pm. I personally was witnessed by the whole top Deck on I-D-
Back →

P.S. Superintendant MR. Hickerson answered my grievance on the unsanitary and Health issues on Detainees of whom he states are wearing hats, Gloves and Aprons upon passing out our food trays at which ~~we~~ Detainees are invoking all Federal and State Rights that Detainees are not wearing any protective wear for our food. We also have foot fungus.

Of speaking to Superintendant "Gary Hickerson" of whom I showed my red spots over body and MR. Supt, Visually Witnessed these spots and the 90 in corridor with Supt and z, was Sheriff "Chico" and z also spoke about the Detainees and z of whom has been without light for over 10 days and of the filthy shower and the shower sewer stopped up for over 2 weeks and we have all constantly complained of these matters and Supt said that he'd look into the light bulbs and the stopped up shower floor, this is all a Federal and State constitutional violation of Amend 8 and 14, 13th and of the State Bill of Rights violation of sections 2, 8.1, 12, 20, 23, and 24. we Detainees are being forced to live under unsanitary conditions and are susceptible to catch any number amount of Diseases such as the one Detainee MR. James Worthem AKA David Scott currently has and have had for over 20 days. today 11/20/07 MR % Salmon was called by Me to cell upper 6 on 1-D and z showed him all the Rashes and he said "unless it's a matter of Life and death z'd have to submit a request slip to Health care, z then tried to explain my situation but he said z became cold and Demanding and yes z did and had every right to do so, then only because of my actions was a paramedic called to my Attention who was Ms. Douglas of whom z seen on 11/16/07 and she clearly stated before the whole top Deck that she Authorized me to go to the Emergency room on 11/16/07 but C.C. Do.C. officials are extremely guilty of Denying the proper Medical Attention.

WE, names below, Affiants, do hereby declare and affirm under penalty of perjury as defined in 735 ZLCS 5/1-109 that everything contained herein is true and accurate to the best of our knowledge and belief. We further declare and affirm that the contents of the foregoing document(s) are known to us and are accurate to the best of our knowledge and belief. Finally, we do declare and affirm that the matter at hand is not taken either frivolously or maliciously and that we believe the foregoing matters is taken in good faith.

Signed on this 20th day
of November 2007

James M. Wordhem
A David ~~Est~~ *Affiant

Witnesses OF TRUTH:

- * MARK DAVIS 20070069988
- * Pedro I. Crespo 2007-004-6591.
- * Richard Ratulowski 2007-007-9919
- * Derrick Gulley 20070054670
- * Rogelio Barajas 2007-0015626
- * Carl Tucker 20070032957
- * Renee Guerra * 20070083946
- * Quintin Watts #20060086053
- * Kenneth Jones Jr. # 20070077298